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23 September 2005

Mr. David L. Orth
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ANNUAL MONITORING REPORT – SOUTHERN SAN JOAQUIN VALLEY WATER QUALITY COALITION- KINGS RIVER SUB-WATERSHED

On 1 April 2005, we received the Annual Monitoring Report (AMR) for the Southern San Joaquin Valley Water Quality Coalition's (SSJWQC) Kings River Sub-watershed. This report was submitted by the SSJWQC to meet the conditions of Resolution No. R5-2003-0105, and the associated Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands (Conditional Waiver).

Water Board staff has reviewed the AMR to evaluate if the document accurately reflects the required reporting conditions detailed in the Conditional Waiver, the conditions set forth in the Kings River Sub-watershed's Monitoring and Reporting Program Plan (MRP Plan), the Quality Assurance Project Plan (QAPP), and to assess the quality of the data generated and the conclusions and recommendations presented. Water Board staff finds that additional data/clarification is necessary to complete the AMR review.

By 31 October 2005, the Coalition needs to address the requested information listed in 1 – 4 below.

1. Provide a detailed map of the entire Sub-watershed that includes the established Sub-watershed boundary (Item 1 of attached staff review).
2. Provide an explanation for the time lag between sampling and submittal of samples for the 14 October 2004 chain of custody documentation (Item 2).
3. Provide a detailed land use map for the Sub-watershed (Item 3).
4. Provide additional information on pesticide use for inclusion in the AMR (Item 6).

The AMR review identified additional areas of concern that, although not required to make the AMR complete, are necessary for the Conditional Waiver program. **By 31 October 2005**, you need to address the requested information listed in 5-8 below.

5. Submit a revised sampling program that includes additional monitoring points including Button Ditch and West Reedley Ditch, as well as a combination of secondary water bodies and return canals; to address the sampling of 20% of additional waterways per year as required by the Conditional Waiver program (Item 11).
6. Provide assurance that prompt Exceedance Reports and follow-up sampling will be preformed whenever statistically significant toxicity is detected, or Basin Plan receiving water limitations are exceeded, as required by the Conditional Waiver Program (Items 4 and 10).
7. Provide documentation for sampling at the Jackson Avenue site that includes the full suite of water quality analysis plus toxicity testing (Item 5).

Items that need to be incorporated into the current monitoring program and/or generated for the next AMR submittal include:

- A) Complete chain of custody documentation (Item 2 of attached staff review);
- B) Submittal of Exceedance Reports whenever water quality exceedance occurs (Items 4 and 8);
- C) Perform the required bacterial sampling and analysis within the required holding times (Item 7);
- D) Perform the required TIE analysis, re-sampling, sampling upstream, and preparation of a Exceedance Report when toxicity exceeds 50% mortality (Item 10);
- E) Collect and analyze toxicity QA/QC samples on the required 5% frequency (Item 12);
- F) Continued work on management practices issues (Item 13).

If you have any questions or comments regarding the review, or need any further information, please contact Alan Cregan at (559) 445-6185.

ORIGINAL SIGNED BY:

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cc: Mr. Tom Pinkos, Regional Water Quality Control Board, Rancho Cordova
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